

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Shakina Liggins : No. 20-11804-MDC
Debtor :

ANSWER TO MOTION OF NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362 AND
CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part, Denied in part. Admitted that a number of payments were missed, but denied all payments were missed. Debtor pleads for a chance to get caught up.
7. Denied.
8. Denied.
9. No response required.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 11/9/2020

A copy of this Answer is being served on Rebecca Solarz, Esquire, and the Chapter 13 Trustee.